# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| SRI INTERNATIONAL, INC., a California Corporation, | ) |                          |
|--|---|--------------------------|
| a Camorina Corporation,                            | ) |                          |
| Plaintiff and                                      | ) |                          |
| Counterclaim-Defendant,                            | ) |                          |
|  | ) | G 4 N 04 1100 (GI D)     |
| v.   | ) | C. A. No.: 04-1199 (SLR) |
| INTERNET SECURITY SYSTEMS, INC.,                   | ) |                          |
| a Delaware Corporation, INTERNET                   | ) |                          |
| SECURITY SYSTEMS, INC., a Georgia                  | ) |                          |
| Corporation, and SYMANTEC                          | ) |                          |
| CORPORATION, a Delaware Corporation,               | ) |                          |
|  | ) |                          |
| Defendants and                                     | ) |                          |
| Counterclaim-Plaintiffs.                           | ) |                          |

# INTERNET SECURITY SYSTEMS, INC., a Delaware Corporation, INTERNET SECURITY SYSTEMS, INC., a Georgia Corporation, AND SYMANTEC CORPORATION'S NOTICE OF DEPOSITION OF ALFONSO VALDES

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendants and Counterclaim-Plaintiffs Internet Security Systems, Inc., a Delaware corporation ("ISS-DE"), Internet Security Systems, Inc., a Georgia corporation ("ISS-GA"), and Symantec Corporation ("Symantec"), through its undersigned counsel, will take the deposition, by oral examination, of Alfonso Valdes, commencing at 9:00 a.m. on February 28, and March 1, 2006 at the offices of Day Casebeer Madrid & Batchelder LLP, 20300 Stevens Creek Boulevard, Suite 400, Cupertino, CA 95014.

The above noticed deposition shall be recorded by stenographic and videographic means before a notary public or other officer authorized by law to administer oaths, and will continue from day to day until completed, weekends and holidays excepted, with adjournments as to time and place as may be necessary. Some or all of the deposition

testimony may involve real-time computer connection between the deposition taker and court reporter using software such as "LiveNote."

Dated: January 11, 2006

#### /s/ David E. Moore

Richard L. Horwitz (#2246) David E. Moore (#3983) Potter Anderson & Corroon LLP Hercules Plaza, 6<sup>th</sup> Floor 1313 N. Market Street P.O. Box 951 Wilmington, DE 19899 Tel: (302) 984-6000

Attorneys for Defendants and Counterclaim-Plaintiffs INTERNET SECURITY SYSTEMS, INC., a Georgia Corporation and INTERNET SECURITY SYSTEMS, INC., a Delaware Corporation

## OF COUNSEL:

Holmes J. Hawkins III Natasha H. Moffitt King & Spalding LLP 191 Peachtree Street Atlanta, GA 30303 Tel: (404) 572-4600

Theresa A. Moehlman Jeffrey D. Blake King & Spalding LLP 1185 Avenue of the Americas New York, New York 10036 Tel.: (212) 556-2100

### /s/ Richard K. Herrmann

Richard K. Hermann (#406)
Mary B. Matterer (#2696)
Morris James Hitchens & Williams LLP
222 Delaware Avenue, 10<sup>th</sup> Floor
P.O. Box 2306
Wilmington, DE 19899
Tel: (302) 888-6800

Attorneys for Defendants and Counterclaim-Plaintiffs SYMANTEC CORPORATION

# OF COUNSEL: Lloyd R. Day, Jr. Robert M. Galvin Paul S. Grewal Day Casebeer Madrid & Batchelder LLP 20300 Stevens Creek Blvd., Suite 400 Cupertino, CA 95014 Tel: (408) 873-0110

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 11<sup>th</sup> day of January, 2006, I electronically filed the foregoing document, INTERNET SECURITY SYSTEMS, INC., a Delaware Corporation, INTERNET SECURITY SYSTEMS, INC., a Georgia Corporation, AND SYMANTEC CORPORATION'S NOTICE OF DEPOSITION OF ALFONSO VALDES, with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

John F. Horvath, Esq. Fish & Richardson, P.C. 919 North Market Street, Suite 1100 Wilmington, DE 19801 Richard L. Horwitz, Esq.
David E. Moore, Esq.
Potter Anderson & Corroon LLP
Hercules Plaza
1313 North Market Street, 6<sup>th</sup> Floor
Wilmington, DE 19801

Additionally, I hereby certify that on the 11<sup>th</sup> day of January, 2006, the foregoing document was served via email on the following non-registered participants:

Howard G. Pollack, Esq. Michael J. Curley, Esq. Fish & Richardson 500 Arguello Street, Suite 500 Redwood City, CA 94063 Holmes Hawkins, III, Esq. King & Spalding 191 Peachtree Street, N.E. Atlanta, GA 30303-1763

/s/ Richard K. Herrmann

Richard K. Herrmann (#405)
Mary B. Matterer (#2696)
Morris, James, Hitchens & Williams LLP
222 Delaware Avenue, 10th Floor
Wilmington, DE 19801
(302) 888-6800
rherrmann@morrisjames.com

Counsel for Defendant SYMANTEC CORPORATION